

EXHIBIT D

So Ordered.

Dated: September 14th, 2020



Frederick P. Corbit

Frederick P. Corbit
Bankruptcy Judge

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10 UNITED STATES BANKRUPTCY COURT
11 EASTERN DISTRICT OF WASHINGTON

12 In Re:

13 GIGA WATT, INC.,

14 Debtor.

15 No. 18-03197-11

16 **STIPULATED ORDER PRESERVING
17 PRIVILEGE PURSUANT TO FRE 502(d)**

18 Based on the stipulation of the parties filed on September 11, 2020 (ECF
19 No. 706), and pursuant to Federal Rule of Evidence 502(d), the Court hereby ORDERS
20 as follows:

21 Any production of documents and/or provision of information by Perkins Coie
22 LLP in this matter to the Chapter 11 Trustee in the above-captioned case (the
23 "Trustee") or his counsel does not and shall not constitute a waiver of the attorney-
24 client privilege or any other privilege or protection that applies or may apply to such
25 documents or information, both as to any documents or information produced to the
Trustee and as to any other documents or information subject to a claim of privilege in
Perkins Coie LLP's possession, whether in this proceeding or in any other federal or

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 1

BYRNES • KELLER • CROMWELL LLP
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(206) 622-2000

1 state proceeding. Perkins Coie LLP may make any such production to the Trustee
2 pursuant to this Court's "Order Regarding Production of Documents Responsive to
3 Rule 2004 Order and Placing Limits on the Use of Confidential Information in Such
4 Documents." ECF No. 673.

5 IT IS SO ORDERED.
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7 //END OF ORDER///
8
9 Presented by:
10
11 BYRNES KELLER CROMWELL LLP
12 By /s/ Bradley S. Keller _____
13 Bradley S. Keller, WSBA #10665
14 By /s/ Ralph E. Cromwell, Jr. _____
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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 2

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

By /s/ Ralph E. Cromwell, Jr.

Ralph E. Cromwell, Jr.

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 3

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